

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

OCT 09 2024

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

-against-

RARE BREED TRIGGERS, LLC;
RARE
BREED FIREARMS, LLC;
LAWRENCE
DEMONICO; KEVIN MAXWELL,

Defendants.

Case No. 1:23-cv-00369-NRM-RML

Sworn Affidavit of Fact by Thomas Allen Graves

REC'D IN PRO SE OFFICE
OCT 9 '24 PM 1:14

Sworn Affidavit of Fact by Thomas Allen Graves

Thomas Allen Graves does hereby swear to aver and attest to under penalty the Following;

I could not and cannot afford to pay for counsel in this case, and

Whereas, I was further indemnified by a licensee that was financially devastated in another case by the same plaintiffs in this case and ultimately the licensee did not indemnify me in this case nor did or could the licensee fulfill the agreement terms of his license, and

Whereas, this licensee has declared under penalty to this court and attached to defendant's pending Rule 60, that he in lieu of indemnification, as licensee, "paid the trigger judgment", and

Whereas, plaintiffs in this case are also licensees and have not paid to me a single cent towards the agreement terms, and are using the monies owed me in this misuse of patent prosecution of me in NDOK "107", and

Whereas, the plaintiffs are also suing me in this case using my own proprietary trigger technology, that I refused to license, and

Whereas, although I refused to license my proprietary trigger technology it was stolen by the plaintiffs' fraudulent patent author and eventually my proprietary trigger technology was then acquired as a utility patent by the plaintiffs, and

Whereas, in EDNY court documents the plaintiffs clearly admit secretly having paid an admitted to minimum of \$2.4 million for my stolen proprietary trigger technology to the fraudulent patent author, and

Whereas, although the plaintiffs have ultimately transferred multiple tens of millions of dollars to their co-conspirators for commercialization of my stolen proprietary trigger technology, and

Whereas, plaintiffs have failed to pay me a single cent on their original multi-million dollar contract debt or compensated me for my stolen proprietary trigger technology in any way, shape or form, I am unable to afford counsel, and

Whereas, this court once I finally located top patent counsel willing to help regardless of my financial predicament, denied me representation, and

Whereas, in the wake of plaintiffs' actions. I have lost a mechanical lab due to finances and been prevented from other important ventures because of the same plaintiffs' actions, and

Whereas, plaintiffs and the court have complained repeatedly in disparagement of my novice pro se procedural practices while I was endeavoring without funding to secure assistance with defense from qualified advisors and BAR certified counsel to more certainly defend my rights in this court proceeding. However and regardless of my success in doing so the plaintiffs' counsel, and the court has the appearance of impropriety related to this particular subject. Both the plaintiffs and the court have decidedly negative reactions relevant to my

request for court leave to admit Adam V. Floyd to the case, and

Whereas, it is painfully obvious to me, and to what any reasonable person would expect and believe proper and correct, that despite plaintiffs' objection to admission of Adam V. Floyd the court could and should make admission of Adam V. Floyd to this case whether or not I am able to comply with further court directives pertinent to ad hac vice concerns because it is fact I cannot afford to do otherwise., and

Whereas, this my Affidavit of fact is made under penalty, it shall be taken by this court as fact, as to my capacity to obtain counsel let alone meaningful counsel.

Your affiant further sayeth naught,

Thomas Allen Graves
Thomas Allen Graves, pro se defendant

(512) 363 - 8440

*P.O. 1238
Sand Springs, OK.
74063*

Signed or attested before me

On: *Sep. 26, 2024*

By: *Morgan Johnson*

Notary: *[Signature]*

Copy to File 090924



Thomas A. Graves
P.O. Box 1238
Sand Springs OK
74063

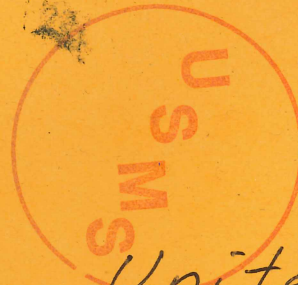


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United States District Court for
the New York Eastern District
225 Cadman Plaza East
Brooklyn, NY 11201

